

EXHIBIT 1

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12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 MARGARITO T. LOPEZ, SONIA
15 TORRES, KENI LOPEZ, ROSY LOPEZ,

16
17 Plaintiffs,

18 vs.

19 CITY OF LOS ANGELES, JOSE
20 ZAVALA, JULIO QUINTANILLA,
21 AND DOES 1 THROUGH 10, INCLUSIVE,

22 Defendants.
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Case No. 2:22-cv-07534-FLA-MAA
[Hon. Fernando L. Aenlle-Rocha]

**PLAINTIFFS' OBJECTIONS TO
SUBPOENAS ISSUED BY
DEFENDANTS JOSE ZAVALA
AND JULIO QUINTANILLA**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT pursuant to FRCP, Rule 45(d)(2)(B),
3 Plaintiffs MARGARITO T. LOPEZ, SONIA TORRES, KENI LOPEZ, and ROSY
4 LOPEZ hereby object to the production of any of Scott A. DeFoe's employment
5 records or any other documents or information in response to the subpoena issued to
6 Riverside County Sheriff's Department, dated on or around March 20, 2024.

7 Plaintiffs' objections are based on the following grounds:

- 8 1. Plaintiffs object on the grounds that they were not served any Notice of
9 Subpoena or a copy of the Subpoena itself, in violation of Rule 45(a)(4).
- 10 2. Plaintiffs object on the grounds that the subpoena is untimely, as its date for
11 compliance, April 8, 2024, is after the Fact Discovery Cutoff Deadline of
12 February 20, 2024 and the Expert Discovery Cutoff Deadline of March 29,
13 2024 in this case, in violation of the Court's Scheduling Order. (Dkt. No. 44).
- 14 3. Plaintiffs object on the grounds that the information sought is privileged and
15 protected under Expert Scott DeFoe's right to privacy under California and
16 Federal law. Sanchez v. City of Santa Ana, 936 F.2d 1027 (9th Cir. 1990), as
17 amended on denial of reh'g (Feb. 27, 1991), as amended on denial of
18 reh'g (May 24, 1991).

19 DATED: April 3, 2024

LAW OFFICES OF DALE K. GALIPO
CARILLO LAW FIRM LLP

21
22
23 By: 

Dale K. Galipo
Renee V. Masongsong
Shannon J. Leap
Attorneys for Plaintiffs

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California and am over the age of eighteen years and not a party to the within action. My business address is 21800 Burbank Boulevard, Suite 310, Woodland Hills, California 91367.

On April 3, 2024, I served the foregoing document described as: **PLAINTIFFS' OBJECTIONS TO SUBPOENAS ISSUED BY DEFENDANTS JOSE ZAVALA AND JULIO QUINTANILLA** on all interested parties, through their respective attorneys of record in this action by placing a true copy thereof enclosed in a sealed envelope addressed as indicated on the attached service list.

METHOD OF SERVICE

☒ (BY MAIL) I enclosed the documents in a sealed envelope or package and addressed to the parties at the addresses as indicated on the attached service list.

☐ I deposited the sealed envelope or package with the United States Postal Service, with the postage fully prepaid thereon.

☒ I placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of this office for the collection, processing and mailing of documents. On the same day that documents are placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

☒ (BY ELECTRONIC SERVICE) I caused the foregoing document(s) to be sent via electronic transmittal to the notification addresses listed below as registered with this court's case management/electronic court filing system.

☐ (BY FEDERAL EXPRESS) I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses as indicated on the attached service list. I placed the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

Executed on April 3, 2024, at Woodland Hills, California.

Santiago G. Laurel

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